WorldCom, Inc. Exparte
Docket No. 01-277
Decemberr 5, 2001
Attachment

Relevant Citation to Prior FCC Orders That Pertain to Outstanding OSS Issues in Georgia and Louisiana

Following, for easy reference, are citations to FCC orders in which the Commission has discussed many (but not all) of the OSS issues that continue to exist in Georgia and Louisiana. BellSouth does not provide OSS that meets the requirements established by the Commission. This is particularly apparent in light of the Commission's stricture that a BOC's OSS must be judged in context. In context, when all of the important outstanding issues with BellSouth's OSS are considered, it is clear that BellSouth's OSS is significantly inferior to that of other BOC's whose section 271 applications have been approved and is insufficient to meet the prerequisites for section 271 authorization.

(1) Change Management

In its Order approving Bell Atlantic's New York Section 271 application, the FCC explained that as part of a BOC's demonstration that it provides efficient competitors a meaningful opportunity to compete, "the Commission will give substantial consideration to the existence of an adequate change management process and evidence that the BOC has adhered to this process over time." NY Order ¶ 102; TX Order ¶ 106. As the FCC explained, "[w]ithout a change management process in place, a BOC can impose substantial costs on competing carriers simply by making changes to its systems and interfaces without providing adequate testing opportunities and accurate and timely notice and documentation of changes." NY Order ¶ 204. This remains one of the most serious problems with BellSouth's application.

(a) BellSouth fails to implement changes prioritized by CLECs.

In approving Bell Atlantic's New York section 271 application, the FCC emphasized that Bell Atlantic's process "prioritize[d] changes based on merit, rather than the sponsor of the change," id. ¶ 106, and noted "we would be concerned about the impact of a BOC disregarding input from competing carriers on change management issues." Id. ¶ 124.

(b) The FCC has emphasized the speed by which a BOC is able to implement changes.

In concluding that Bell Atlantic's change management process in New York was adequate, the FCC specifically noted that "when MCI WorldCom expressed a preference regarding how customer service record addresses be made available to competing carriers, Bell Atlantic agreed to add this functionality within the remaining weeks before the related change release. At the same time, Bell Atlantic devised a special software approach to defer implementation of this functionality for AT&T, the sole competing carrier that objected to this change." NY Order ¶ 124 (emphasis added). Here, BellSouth is not implementing needed changes quickly.

(c) The FCC has described a detailed release schedule as an important part of a change management plan.

BellSouth's release schedule, unlike that of other BOCs, does not include in that schedule the expected content of future releases. The FCC noted approvingly that SWBT provides "competing carriers with a '12-Month Development Plan,' which reflects SWBT's plans for future OSS modifications." TX Order ¶ 111.

(2) Separate Test Environment

The FCC has emphasized the importance of a separate testing environment that mirrors the production environment and that enables CLECs to ensure interfaces are ready before they begin using those interfaces. NY Order ¶¶ 109-10, 119-22; TX Order ¶¶ 132-43. BellSouth does not have a separate test environment.

(3) Pre-order/Order Integration

One of the primary reasons that this Commission rejected BellSouth's prior section 271 applications was that BellSouth failed to provide integratable pre-ordering/ordering interfaces. SC Order ¶ 155-66; LA I Order ¶¶ 49-55; LA II Order ¶¶ 96-103. BellSouth has not yet resolved this problem.

(a) Parsed CSRs

In approving Bell Atlantic's New York Section 271 application, the FCC stated that, "the BOC must enable competing carriers to transfer pre-ordering information electronically to the BOC's ordering interface or to the carriers' own back office systems, which may require 'parsing' pre-ordering information into identifiable fields." NY Order ¶ 137. And in the Texas Order, although the FCC concluded that parsed CSRs were not the only way that a BOC could enable CLECs to integrate pre-ordering and ordering, a BOC could most readily show its interfaces were integratable by offering parsed CSRs. TX

Order ¶ 153. BellSouth has not provided parsed CSRs and also has not demonstrated that its pre-ordering and ordering interfaces are integratable through other methods.

(b) Migrate by TN

In approving SWBT's section 271 application in Texas, the FCC noted that this enhancement "provides assurances that carriers that have yet to attempt integration should be able to avoid the burden of receiving and processing a large number of address-related rejects." TX Order ¶ 160. Although SWBT, like BellSouth, implemented migrate by TN during the section 271 process, SWBT did so soon after CLECs requested migrate by TN. BellSouth waited years before doing so. Because of BellSouth's delay, BellSouth did not make migration by TN available to CLECs until after it filed its section 271 application, and, even today, there are still a number of glitches with the migrate by TN process. While the new migrate by TN and house number process has reduced rejects, it has created new problems that CLECs cannot resolve. Mismatches between the BellSouth RSAG and CSR databases cause orders to be rejected. This further delays and complicates the migration process.

(c) High Reject Rate

It remains true, as this Commission explained in rejecting BellSouth's application for section 271 authority in South Carolina, that "BellSouth has not adequately explained or supported its contention that the errors of competing carriers are the cause of its EDI interface's high rejection rate. Instead, the record evidence supports a finding that the high error rates are due, to a significant degree, to BellSouth's failure to meet its obligation to provide competing carriers with information and support concerning the effective use of the EDI interface. We also find that deficiencies in BellSouth's OSS access, such as the lack of integration between the pre-ordering and ordering functions, are contributing to competing carriers' high error rates. We find that the high rejection rate of BellSouth's EDI interface precludes competing carriers from obtaining nondiscriminatory access to ordering and provisioning systems." SC Order ¶ 114.

(4) Too much manual processing

The FCC has found a "direct correlation between the evidence of order flow-through and the BOC's ability to provide competing carriers with nondiscriminatory access to the BOC's OSS functions." LA II Order ¶ 107. Although the Commission has approved section 271 applications in other states with less than perfect flow through, it has done so because significant commercial experience in those states (or in other states in the same region) showed that the BOC was capable of handling increasing order volumes with existing levels of manual processing. BellSouth cannot make such a showing in Georgia where manual processing is leading to significant problems. Nor can it make such a showing in Louisiana where it has almost no experience in provisioning UNE-P to residential customers -- especially given the evidence from Georgia that BellSouth's manual processes continue to lead to significant errors.

(5) Line loss reports

This Commission recently explained the need for a BOC to provide CLECs with accurate line loss reports. PA Order ¶ 52. "If a carrier does not receive complete, timely and accurate line-loss notifications, a carrier will continue to bill an end-user even though the end-user has discontinued service with that carrier." Id. BellSouth has acknowledged its line loss reports are incomplete and that it can locate and re-submit to CLECs only line loss reports from the past 60 days. A fix to the line loss problem "may" be implemented by the end of 1Q02.

(6) Accurate billing information

In its PA Order, ¶¶ 13-30, this Commission properly explained that BOCs must provide CLECs with complete, accurate and timely wholesale bills and with complete, accurate and timely reports on the service usage of CLECs' customers. There are a number of defects in BellSouth's bills that impede the ability of CLECs to compete.

WorldCom
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